# Chill Airways – Privacy Policy

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## 1. Introduction

Chill Airways Foundation ("Chill Airways", "we", "our", "us") respects your privacy and is committed to protecting the personal data you provide while interacting with our platform, including our website, token-based services, DAO governance tools, and community initiatives.

This Privacy Policy outlines how we collect, use, store, and share your personal data in accordance with applicable privacy laws in the **United Arab Emirates (UAE)** and other jurisdictions where our users may reside.

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## 2. Scope

This Policy applies to:

- Visitors to our website and dApps
- Participants in our DAO and NFT programs
- Token holders of $AUTOPILOT, $JET, or related assets
- Partners and service providers interacting with our SPVs
- Individuals undergoing KYC/AML verification for participation in SPVs (e.g. JET Tokens)

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## 3. What Information We Collect

We may collect and process the following categories of personal data:

**a. Directly from you:**

- Name, email address, wallet address
- Contact details provided via forms or communication
- KYC/AML documentation (for SPV participation where required)

- Participation logs (DAO votes, NFT interactions)

**b. Automatically through our services:**

- IP address, browser type, device ID
- Interaction logs (pages visited, actions taken)
- Analytics data (via privacy-respecting tools like Plausible or similar)

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## 4. How We Use Your Data

We may use your data for:

- Administering DAO governance and proposal participation
- Performing KYC/AML checks when legally required
- Issuing NFT boarding passes, XP quests, and loyalty rewards
- Enabling SPV participation through token whitelisting
- Responding to legal or regulatory requests
- Sending updates about governance events, proposals, or ecosystem developments
- Improving platform functionality and user experience

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## 5. Legal Basis for Processing (Under UAE & Global Law)

Our processing is based on:

- Your **consent** (when you opt-in or connect your wallet)
- **Contractual necessity** (e.g., whitelisting for SPV tokens)
- **Legal obligation** (compliance with UAE regulatory bodies)
- **Legitimate interest** (security, community engagement, DAO integrity)

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## 6. Data Sharing and Disclosure

We may share personal data only where necessary and under strict compliance conditions:

- With our legal entity partners (e.g., SPVs, auditors, legal advisors)
- With KYC/AML service providers for regulatory onboarding
- With UAE regulators (e.g. ADGM, FSRA) if required
- With DAO tooling or token infrastructure providers under contractual agreements
- With law enforcement agencies when legally mandated

We **do not sell** your personal data.

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## 7. Cross-Border Transfers

Data may be transferred outside of the UAE (e.g., for cloud hosting or DAO tooling) under legally recognized safeguards, including:

- Adequacy decisions
- Standard contractual clauses
- Explicit user consent where applicable

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## 8. Data Retention

We retain personal data only for as long as necessary:

- For DAO governance, participation records may be stored indefinitely in anonymized form
- KYC/AML data for SPV participation is retained in accordance with UAE legal obligations
- General user data (e.g., form submissions) is retained for up to 2 years unless otherwise required

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## 9. Your Rights

Depending on your jurisdiction, you may have rights including:

- Access to your data
- Correction or deletion of your data
- Objection to or restriction of processing
- Data portability
- Withdrawal of consent at any time

To exercise any of these rights, contact us at: [Insert Contact Email / DAO support link]

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## 10. Security Measures

We use industry-standard security practices including:

- Multisig wallet protections
- Encrypted storage for sensitive data
- Secure access control for internal systems
- Audit logs for DAO and treasury interactions

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## 11. Children's Privacy

Our services are not directed to individuals under the age of 18. We do not knowingly collect personal information from minors.

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## 12. Policy Updates

We may update this Privacy Policy from time to time. When we do, the updated version will be posted on our site with a revised effective date. Material changes may be communicated via DAO governance announcements or our website.

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## 13. Governing Law

This Privacy Policy shall be governed by the laws of the **Abu Dhabi Global Market (ADGM)** or other relevant UAE jurisdictions, without prejudice to the rights granted under other global privacy laws (such as GDPR or CCPA).

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## 14. Contact

For privacy-related inquiries or to exercise your rights, contact:

**Chill Airways Foundation**
Abu Dhabi, United Arab Emirates
legal@chillairways.org